

Exhibit A

HONORABLE BENJAMIN H. SETTLE

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DINAH CANADA, MARIE JOHNSON-
PEREDO and ROBERT HEWSON on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

MERACORD, LLC; LINDA REMSBERG and
CHARLES REMSBERG, individually and on
behalf of the marital community; LLOYD E.
WARD and AMANDA GLEN WARD,
individually and on behalf of the marital
community; LLOYD WARD, P.C.; LLOYD
WARD & ASSOCIATES, P.C.; THE LLOYD
WARD GROUP, P.C. (D/B/A LLOYD
WARD GROUP II); WARD HOLDINGS,
INC.; and SETTLEMENT COMPLIANCE
COMMISSION, INC.,

Defendants.

NO. 3:12-CV-05657-BHS

**MERACORD DEFENDANTS' RULE 68
OFFER OF JUDGMENT AS TO
PLAINTIFF CANADA**

MERACORD DEFENDANTS' RULE 68 OFFER OF
JUDGMENT AS TO PLAINTIFF CANADA

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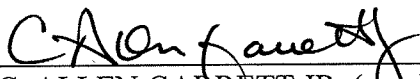
6 Stuart M. Paynter
7 Celeste H. G. Boyd
8 THE PAYNTER LAW FIRM PLLC
9 1200 G Street N.W., Suite 800
10 Washington, DC 20005

11 Pursuant to Federal Rule of Civil Procedure 68, Defendants Meracord LLC, Linda
12 Remsburg, and Charles Remsburg (collectively, the "Meracord Defendants"), by and through
13 their undersigned attorneys, hereby offer to allow judgment to be taken against them and in favor
14 of Plaintiff Dinah Canada for the sum of \$37,608.00, plus reasonable attorneys' fees, costs, and
15 expenses, in full satisfaction of all damages and relief sought by Ms. Canada on her individual
16 claims in this action.

17 Pursuant to Fed. R. Civ. P. 68(d), if the judgment that Ms. Canada obtains is not more
18 favorable than this unaccepted offer, Ms. Canada must pay costs incurred after this offer is made.
19 This Offer of Judgment is made pursuant to Fed. R. Civ. P. 68 and is not to be construed as an
20 admission of any liability on the part of the Meracord Defendants.

21 DATED this 25th day of April, 2013.

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MERACORD DEFENDANTS' RULE 68 OFFER OF
JUDGMENT AS TO PLAINTIFF CANADA

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2013, I served a copy of the foregoing upon all counsel of record by e-mail and by depositing a true and correct copy thereof in the United States mail, first-class postage prepaid, addressed as follows:

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One of the Attorneys for the Meracord Defendants